

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**JACOB BEHOUNEK, Individually and on  
Behalf of All Others Similarly Situated**

**PLAINTIFF**

vs.

No. 1:22-cv-2341-EEC

**WHO'Z THE BOSS MUSIC, INC.,  
and DAVID A. HERRERO**

**DEFENDANTS**

**PLAINTIFF'S NOTICE OF ACCEPTANCE OF OFFER OF JUDGMENT**

Plaintiff Jacob Behounek ("Plaintiff"), by and through Plaintiff's attorneys, Sanford Law Firm, PLLC, for Plaintiff's Notice of Acceptance of Offer of Judgment, does state and allege as follows:

1. On June 29, 2022, counsel for Defendants Who'z the Boss Music, Inc., and David A. Herrero ("Defendants") emailed Plaintiff's counsel with an offer of judgment in the sum of \$7,000 in settlement of Plaintiff's claims against Defendants in this action, inclusive of all damages, costs, attorneys' fees, and expenses accrued to date. Defendants' Offer of Judgment to Plaintiff is attached as Exhibit 1.
2. The deadline to accept the Offer of Judgment is July 13, 2022.
3. Plaintiff accepts Defendants' Offer of Judgment for the sum total of \$7,000 for his claims alleged in this lawsuit, inclusive of all damages, costs, attorneys' fees, and expenses accrued to date.

Respectfully submitted,

**JACOB BEHOUNEK, Individually  
and on Behalf of All Others Similarly  
Situating, PLAINTIFF**

SANFORD LAW FIRM, PLLC  
Kirkpatrick Plaza  
10800 Financial Centre Pkwy, Suite 510  
Little Rock, Arkansas 72211  
Telephone: (501) 221-0088  
Facsimile: (888) 787-2040

/s/ Colby Qualls  
Colby Qualls  
Ark. Bar No. 2019246  
[colby@sanfordlawfirm.com](mailto:colby@sanfordlawfirm.com)

/s/ Josh Sanford  
Josh Sanford  
Ark. Bar No. 2001037  
[josh@sanfordlawfirm.com](mailto:josh@sanfordlawfirm.com)

**CERTIFICATE OF SERVICE**

I, the undersigned counsel, do hereby certify that on the date imprinted by the CM/ECF system, a copy of the foregoing NOTICE was filed via the CM/ECF system, which will provide notice to the following attorneys of record:

Jeffery Rudd, Esq.  
Julia Pearce Argentieri, Esq.  
JACKSON LEWIS P.C.  
150 North Michigan Avenue, Suite 2500  
Chicago, Illinois 60601  
Telephone: (312) 803-2547  
Facsimile: (312) 878-4995  
[Jeffery.Rudd@jacksonlewis.com](mailto:Jeffery.Rudd@jacksonlewis.com)  
[Julia.Argentieri@jacksonlewis.com](mailto:Julia.Argentieri@jacksonlewis.com)

/s/ Colby Qualls

**Colby Qualls**